

## Attachment 4

Reuben Steck's First Trial Testimony

(Steck - Direct)

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1 (Plaintiff's Exhibits 546 and 547 received)

2 MR. ACKER: Thank you.

3 BY MR. ACKER:

4 Q. If you could put up Exhibit 546. Mr. Steck, if -- if I  
5 could have the last bottom right-hand number highlighted.

6 Mr. Steck, what does this number on this chart,  
7 \$7,359,304, represent?

8 A. That \$7.3 million represents the amounts paid to the  
9 hospital for claims that occurred on the same date and for the  
10 same patient as physician claims that were submitted by the  
11 practice groups, the Tuomey practice groups.

12 Q. Those four Tuomey program groups that had part-time  
13 contracts with the physicians?

14 A. That's correct.

15 Q. And --

16 A. Broken up by those physicians who had the part-time  
17 contracts.

18 Q. Okay. And do you recall the number of the total amount of  
19 claims related to these -- excuse me. Do you recall the  
20 number of the total amount of claims, total value of the  
21 claims paid to Tuomey in relation to these 18 physicians  
22 regardless of whether or not it related to the part-time  
23 contracts?

24 A. If I can look at the previous exhibit, I could.

25 Q. Yes, please do.

(Steck - Direct)

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1 A. The total was 44,888,601.

2 Q. And is it fair to say that this \$7 million number on the  
3 chart that's up is a subset of the 44 million?

4 A. That's correct.

5 Q. And the 7 million only relates to the part-time contract  
6 services?

7 A. That's correct.

8 Q. If you can put up Exhibit 547 and if you could highlight  
9 the bottom right-hand number. And what does this number,  
10 13,020, represent?

11 A. That number represents the count of the claims that met  
12 the criteria we were talking about, specifically the  
13 relationship between physician services rendered through the  
14 practice groups and the physicians who had part-time  
15 contracts.

16 Q. And so this number only relates to the services billed by  
17 Tuomey in connection with the services provided under the  
18 part-time contracts?

19 A. That's correct.

20 Q. And that's a subset of the larger number on the previous  
21 Exhibit that you looked at?

22 A. Yes, it is.

23 Q. And were the summaries that you made on Exhibits 546 and  
24 547 done to a reasonable degree of certainty?

25 A. Yes, they were.